

March 20, 2007

BY ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: CG Docket No. 03-123

Dear Madam Secretary:

I understand that the Commission is considering adopting a single rate for STS, TTY and IP Relay. Such a move would be bad for STS and harm STS users. STS has traditionally been reimbursed at a higher rate than IP Relay and TTY. If the FCC were to lower the rate for STS it likely would reduce outreach and impede the use of STS. This is unacceptable, especially given that speech-disabled users already are underserved by TRS providers even at the current STS rate.

In particular, lowering the STS rate would almost certainly lead to a reduction in outreach and education by STS providers. As I've explained before, both the ADA and the Commission's rules require outreach and education for all forms of TRS, including STS. Indeed, effective national outreach should be one of the FCC's universal service goals.

Outreach and education have been critically important to the development of STS, both with regard to reaching people with speech disabilities and in educating others about this important service. STS call volumes are still extremely low because of inadequate outreach and education. But STS call volumes rise rapidly when effective outreach is in place.

One of the key obstacles preventing more people from using profoundly life-affecting relay services such as STS is the lack of sufficient outreach. If the FCC were to reduce the STS rate it would only make the problem worse. The result would be even poorer service and even less outreach for a speech-disabled community that is already woefully underserved.

I strongly urge the FCC to set a reimbursement rate for STS that encourages more outreach, not less. These outreach efforts are essential to fostering increased call volumes and increased quality of service for STS.

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This letter is submitted as an *ex parte* communication in the above-referenced proceeding, and is filed pursuant to Section 1.1206 of the Commission's rules.

Very truly yours,

Bob Segalman, Ph.D., D.Sc. (Hon)
President, Speech Communication Assistance By Telephone,
Inc.
Founder, Speech to Speech